

EXHIBIT I

Declaration of Chapin Bryce

1 WILLIAM A. ISAACSON (*Pro hac vice*)
 (wisaacson@bsflp.com)
 2 STACEY K. GRIGSBY (*Pro hac vice*)
 (sgrigsby@bsflp.com)
 3 NICHOLAS WIDNELL (*Pro hac vice*)
 (nwidnell@bsflp.com)
 4 BOIES SCHILLER FLEXNER LLP
 1401 New York Avenue, NW
 5 Washington, DC 20005
 Tel: (202) 237-2727; Fax: (202) 237-6131
 6

RICHARD J. POCKER #3568
 (rpocker@bsflp.com)
 BOIES SCHILLER FLEXNER LLP
 8 300 South Fourth Street, Suite 800
 Las Vegas, Nevada 89101
 9 Tel: (702) 382-7300; Fax: (702) 382-2755

10 DONALD J. CAMPBELL #1216
 (djcc@campbellandwilliams.com)
 11 J. COLBY WILLIAMS #5549
 (jcw@campbellandwilliams.com)
 12 CAMPBELL & WILLIAMS
 700 South 7th Street
 13 Las Vegas, Nevada 89101
 Tel: (702) 382-5222; Fax: (702) 382-0540
 14

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Mr. Quarry, Jon Fitch, Brandon
 20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
 on behalf of themselves and all others similarly
 21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
 Championship and UFC,

25
 26 Defendant
 27
 28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF CHAPIN
 BRYCE IN SUPPORT OF ZUFFA,
 LLC'S OPPOSITION TO
 PLAINTIFFS' MOTION TO
 COMPEL DEFENDANT TO
 PRODUCE A LOG OF
 COMMUNICATIONS FOR DANA
 WHITE'S DISCOVERABLE
 TELEPHONE NUMBERS AND
 ELECTRONIC COMMUNICATION
 DEVICES AND DIRECTING
 DEFENDANT TO SUBMIT AN
 INVENTORY OF ELECTRONIC
 COMMUNICATION DEVICES (ECF
 No. 396)**

1 I, Chapin Bryce, declare as follows:

2 1. I am a consultant in the New York digital forensics lab at Stroz Friedberg, LLC
3 (“Stroz Friedberg”), a specialized risk management firm with expertise in digital forensics,
4 cybersecurity, and investigations. I regularly perform digital forensic preservation and analysis of
5 laptop and desktop computers, email content, mobile devices, file servers, network logs, and cloud
6 solutions in civil and criminal cases, internal investigations, and other matters involving digital
7 media. Stroz Friedberg has been retained by Counsel for Zuffa, LLC (“Zuffa”) in the above
8 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
9 2:15-cv-01045-RFP-PAL. [REDACTED]

10 [REDACTED]
11 2. I hold a bachelor’s degree in Computer and Digital Forensics from Champlain
12 College. I have earned certifications in digital forensics and incident handling including GIAC
13 Certified Forensic Examiner (GCFE) and GIAC Certified Incident Handler (GCIH). I am also a co-
14 author of the book “Learning Python for Forensics,” a publication teaching the development and
15 implementation of scripts for use in digital forensics.

16 3. I make this declaration in support of Zuffa’s Opposition to Plaintiffs’ Motion to
17 Compel Defendant to Produce a Log of Communications for Dana White’s Discoverable Telephone
18 Numbers and Electronic Communication Devices and Directing Defendant to Submit an Inventory
19 of Electronic Communication Devices and Related Documents (ECF No. 396).

20 4. Except where otherwise stated, based on my review of physical and electronic
21 evidence and records, I have personal knowledge of the facts set forth in this Declaration and, if
22 called to testify, could and would testify competently to those facts under oath.

23 5. In May 2017, Boies Schiller Flexner LLP engaged Stroz Friedberg to assist in the
24 preservation and extraction of active and recoverable text and multimedia messages from two mobile
25 devices and other requests related to this case. Stroz Friedberg received the mobile devices on May
26 16, 2017.

27 6. The first mobile device, designated as evidence number ES0001, is a Nokia cell
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1 phone, model 6101b, type RM-77. The provided phone number for this device ends in “20” (the “-20
2 device”). This device contained a T-Mobile SIM card, which I forensically examined. My
3 examination did not identify any phone number stored on this SIM card.

4 7. The second mobile device, designated as evidence number ES0002 is a Nokia cell
5 phone, model 6101b, type RM-77. The provided phone number for this device ends in “75” (the “-75
6 device”). This device contained a T-Mobile SIM card, which I forensically examined and verified
7 the phone number on the SIM card matched the phone number provided to us for this device.

8 8. Upon receipt, I documented and preserved these two devices using industry standard
9 forensic practices and software. I leveraged the Cellebrite UFED Touch for acquisition of the
10 devices and Cellebrite UFED Physical Analyzer software (collectively “Cellebrite”) for analysis of
11 the device preservations. Using Cellebrite, I preserved a full physical binary extraction and file
12 system acquisition of each device and a file system and logical acquisition of each SIM card. In
13 addition to preservation within Cellebrite, I extracted parsed message information and binary content
14 from the acquisition.

15 9. I examined the binary content extracted from the preservation and performed a visual
16 inspection of the active messages on the devices. I conducted this visual inspection using a faraday
17 box to shield the devices within the box from radio frequency and wireless communication signals,
18 including Bluetooth, WiFi, and cellular bands.

19 10. According to the user manual, the storage capacity for media on the Nokia 6101b
20 device is approximately 3 MB¹. I examined the total storage displayed on each phone visually and
21 found it to be consistent with what was listed in the manual. 3 MB is a relatively small amount of
22 storage. For example, an average iPhone 6 photo is 1.56 MB². Using this average photo size, the
23 approximate 3 MB storage on these devices would be consumed with less than two iPhone 6 images.

24 11. Forensic analysis of the data from both devices reveals that messages are stored on
25 the devices in a multi-file format. This differs from modern mobile operating systems that generally
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27 ¹ Nokia 6101 User Manual Found at https://www.nokia.com/en_int/phones/sites/default/files/user-guides/Nokia_6101_UG_en.pdf.

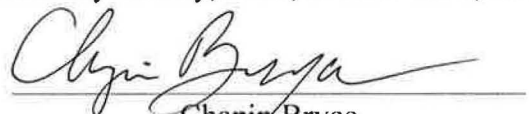
28 ² Average size based on a sample of 181 JPEG photos with a combined size of 281.6 MB, captured with an iPhone 6.

1 store message information in a database. This multi-file format means that the phone does not always
 2 store the full content of a message in a single file. As such, some message entries recovered from
 3 these devices represent metadata³ disassociated from message body content, or message body
 4 content disassociated from metadata. The message body content entries I identified do not contain an
 5 identifier to the associated metadata. The recovered message body content may or may not match a
 6 recovered set of metadata or belong to an unrecovered previously sent or received message. Nor did
 7 I observe an overt identifier in the recovered message metadata entries for the respective message
 8 content. The recovered metadata may or may not match recovered content or may belong to an
 9 unrecovered previously sent or received message.

10 12. On the -20 device, 186 message entries were recovered in total. I did not identify any
 11 active messages on this device during the visual inspection or through forensic analysis. 147 of the
 12 186 message entries were recovered by Cellebrite and represent disassociated message content and
 13 metadata that could not be re-associated. Through additional forensic examination of the data, I
 14 identified metadata for 39 messages which were not identified by Cellebrite.

15 13. On the -75 device, I recovered 304 message entries in total. I recovered 168 messages
 16 with associated metadata and message content through Cellebrite. 95 of the 304 message entries are
 17 fragments I recovered from the device with Cellebrite, which represent disassociated message
 18 content and metadata that could not be re-associated. Through additional forensic examination of the
 19 data, I identified 41 message metadata and content entries which were not identified by Cellebrite.
 20

21 I declare under penalty of perjury under the laws of the United States of America that the
 22 foregoing facts are true and correct. Executed this 24th day of May, 2017, in New York, NY.

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 24 Chapin Bryce

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 28 ³ Metadata, or "data about data" in this instance refers to the date, time, folder, and other party for a given message.